

Exhibit A

5. At the time of the collision, Plaintiff was a passenger in an automobile travelling northbound on Lafayette.

6. As a direct result of the aforesaid occurrence, Plaintiff's head, neck, shoulders and arms and all of the bones, joints, muscles, tendons, ligaments, nerves, skin, vessels and intervertebral discs thereof were caused to be severely bruised, contused, lacerated, sprained, strained, herniated, dislocated, and rendered swollen and inflamed. Plaintiff has suffered, and will suffer in the future, severe pain and mental anguish as a result thereof; and the use, movement and function of the aforesaid injured parts have been seriously and permanently impaired and diminished.

7. As a further and direct result of the aforesaid occurrence and the resulting injuries and damages sustained by Plaintiff, Plaintiff has been caused to undergo certain reasonable and necessary hospital and medical care and treatment, for which Plaintiff has been caused to incur or become indebted for an amount not yet determined, and Plaintiff will be caused to undergo further such care and treatment in the future and to incur or become indebted for further such large sums therefore.

8. As a further direct result of the aforesaid occurrence and the result of injuries and damages sustained by Plaintiff, Plaintiff's ability to work, labor, and to enjoy the ordinary pursuits of life have been severely impaired and diminished; Plaintiff has lost time and wages from employment in an amount not yet determined.

9. The aforesaid collision and the resulting injuries sustained by Plaintiff were directly and approximately caused by the negligence and carelessness of Defendant in the operation, maintenance, and control of his motor vehicle in the following respects, to wit:

- (a) Defendant Heady did operate his motor vehicle at a rate of speed that was high, excessive, and dangerous under the circumstances and conditions then and there existing.
- (b) Defendant Heady failed and omitted to keep and maintain a constant, careful, and vigilant watch and lookout ahead and laterally so as to see and discover the presence and movement of other vehicles at or near the aforesaid location.
- (c) Defendant Heady failed and omitted to stop his motor vehicle, slacken the speed thereof, change the course thereof, swerve the same aside, or sound a warning of her approach and movement when, in the exercise of the highest degree of care, he could and should have done so, and thus and thereby have avoided the aforesaid occurrence and resulting injuries sustained by Plaintiff.
- (d) Defendant Heady did, at the time and place aforesaid, negligently and carelessly cause and permit his motor vehicle to overtake, strike, and collide with the vehicle being occupied by Plaintiff.
- (e) Defendant Heady failed and omitted to yield to Plaintiff's vehicle.
- (f) Defendant Heady failed to stop at the stop sign controlling the intersection of Lafayette and S. 9th Street in violation of Section 302.270.1 (2) R.S.Mo.

WHEREFORE, Plaintiff Anthony Trupiano states that he has been damaged, for which damage he prays judgment against Defendant Brady Heady in such sum as may be fair and reasonable in the premises, but in excess of Twenty-Five Thousand Dollars (\$25,000.00), together with prejudgment interest and court costs in this behalf expended.

Respectfully submitted,

/s/ John A. Bouhasin
John A. Bouhasin #49050
Bouhasin Law Firm, P. C.
5205 Hampton Avenue
St. Louis, Missouri 63109-3102
Tel: (314) 832-9600, ext. 102
Fax: (314) 932-7672

bouhasinlaw@gmail.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system this 13th day of January 2016.

/s/ John A. Bouhasin

Exhibit A

Respectfully submitted,

/s/ John A. Bouhasin

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The undersigned hereby certifies that the foregoing was e-filed with the Clerk of the Court and Mark Rodebaugh at Patriot Investigative Services, LLC, at merodebaugh@outlook.com.

/s/ John A. Bouhasin

1622-CC00086

IN THE CIRCUIT COURT OF THE CITY OF ST LOUIS
STATE OF MISSOURI
22nd JUDICIAL CIRCUIT

ANTHONY TRUPIANO,
Plaintiff,

v.

BRADY HEADY,
Defendant,

Serve Defendant at:
1701 BLUE JAY COVE
ST LOUIS MO 63144

Cause No.

Division No.

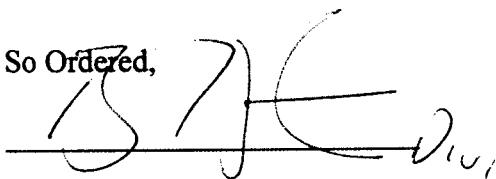
JURY TRIAL DEMANDED

FILED
JAN 13 2016
22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
BY _____

REQUEST FOR ALIAS SUMMONS TO ISSUE

COMES NOW Plaintiff, Anthony Trupiano, and requests alias summons be issued upon Defendant, Brady Heady, 1701 Blue Jay Cove, St. Louis, MO 63144, and to further appoint special process server, Mark Rodebaugh, Patriot Investigative Services, LLC, 5014 Alexander Street, St. Louis, MO 63116, to issue for Attorney for Plaintiff, John A. Bouhasin.

So Ordered,



Date:

1/13/16

Exhibit A

Respectfully submitted,

/s/ John A. Bouhasin

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/s/ John A. Bouhasin

**IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI**

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC00086	Process Server 1
Plaintiff/Petitioner: ANTHONY V. TRUPIANO	Plaintiff's/Petitioner's Attorney/Address JOHN A BOUHASIN 5205 HAMPTON ST LOUIS, MO 63109-3102	Process Server 2
Defendant/Respondent: BRADY HEADY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Process Server 2
Nature of Suit: CC Pers Injury-Vehicular		(Date File Stamp)

Summons in Civil Case**The State of Missouri to: BRADY HEADY**

Alias:

1701 BLUE JAY COVE
ST. LOUIS, MO 63144**SPECIAL PROCESS SERVER**

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

JANUARY 13, 2016

Date

*Thomas Kloeppinger*Thomas Kloeppinger
Circuit Clerk

Further Information:

Sheriff's or Server's Return**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server_____
Signature of Sheriff or Server**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public**Sheriff's Fees, if applicable**

Summons \$ _____

Non Est \$ _____

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC00086	Process Server 1
Plaintiff/Petitioner: ANTHONY V. TRUPIANO	Plaintiff's/Petitioner's Attorney/Address JOHN A BOUHASIN 5205 HAMPTON ST LOUIS, MO 63109-3102	Process Server 2
Defendant/Respondent: BRADY HEADY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Process Server 2
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Summons in Civil Case

The State of Missouri to: BRADY HEADY

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Thomas Kloepfinger

Thomas Kloepfinger
Circuit Clerk

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Served at 1701 BLUE JAY COVE _____ (address)

in ST. LOUIS COUNTY (County/City of St. Louis), MO, on 1/14/16 (date) at 2:20 PM (time).

MARK RODEBAUGH
Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
 Non Est \$ _____
 Mileage \$ _____ (_____ miles @ \$ _____ per mile)
 Total \$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.